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August 27, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: **Dominion Energy South Carolina, Inc., 2021 IRP Update and South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Inc.**  
**Dockets No. 2021-9-E and 2019-226-E**

Dear Ms. Boyd:

Dominion Energy South Carolina, Inc. (“DESC”) writes for two reasons. The first is to support the request of the South Carolina Office of Regulatory Staff (“ORS”) that the Public Service Commission of South Carolina (the “Commission”) reconsider the notice of hearing and prefiling schedule in this proceeding and establish a schedule that provides for the prefiling of testimony and hearing after ORS has issued its report under S.C. Code Ann. § 58-37-40(D)(2). ORS made its request by letter dated August 26, 2021.

The prefiling of testimony and hearing prior to the completion of the ORS report would be contrary to the structure and intent of the IRP statute which makes the ORS report a primary focus for the Commission’s consideration of an IRP update. See S.C. Code Ann. § 58-37-40(D)(2).

A second and more fundamental issue concerns the nature of the review in this proceeding. The IRP statute does not provide for a hearing concerning annual IRP updates. See S.C. Code Ann. § 58-37-40(D). It instead reflects a clear intent that the review of annual IRP updates should be conducted on a paper record consisting primarily of the IRP update and the report filed by ORS. DESC respectfully requests that the Commission reconsider the notice of hearing in light of the intent of the statute, and provide (a) for written comments to be filed by the parties after the ORS



has issued its report, and (b) for the Commission's review of the 2021 IRP update to be based on the resulting record.

To allow for the orderly administration of the IRP statute, DESC requests that it and other parties be allowed thirty (30) days after the filing of the ORS report to prepare and file their comments on the report and 2021 IRP update. DESC would further request that the schedule allow the parties to file responsive comments not less than fourteen (14) days after the parties' file their initial comments.

If the Commission decides to proceed with a hearing, DESC would recommend that the Commission allow similar timing for the prefiling of direct and rebuttal testimony.

This letter also requests that the Commission expedite the consideration of these matters in light of the short time the parties have to comply with the prefiling schedule. The Commission set September 9, 2021, as the deadline for all parties to prefile direct testimony. This deadline is less than two weeks away. DESC would respectfully request that the Commission act expeditiously on ORS's and DESC's requests so that the parties may know how to proceed during this compressed time period.

Thank you in advance for your consideration of these matters. Please contact me if you have any concerns or questions concerning this filing.

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Respectfully submitted,

/s/Belton T. Zeigler

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cc: All counsel of record